

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

AUDREY WOOD	§	
Plaintiff,	§	
V.	§	
MB INVESTMENT, LLC, KHUSHMEET	§	CIVIL ACTION NO.
DHILLON AND GURLEEN K.DHILLON	§	3:18-CV-2651-S
Defendants.	§	
	§	

**DEFENDANTS' ORIGINAL ANSWER**

JB Investment, LLC, Khushmeet Dhillon and Gurleen K. Dhillon, Defendants herein, now file this Original Answer, as follows.

**PARTIES**

1. Defendants are without sufficient information to admit or deny the allegations contained in Paragraph 1 of Plaintiff's Complaint and Demand for Jury Trial (the "Complaint").
2. Defendants deny the allegations contained Paragraph 2 of the Complaint.
3. Defendants deny the allegations contained in Paragraph 3 of the Complaint.
4. Defendants deny the allegations contained in Paragraph 4 of the Complaint.
5. Defendants admit that Plaintiff's job duties are essentially as described in Paragraph 5 of the Complaint, but deny that all Defendants employed her.
6. Defendants admit that Plaintiff had varying hours of work, as alleged in the first sentence of Paragraph 6 of the Complaint but deny that all Defendants employed

her. Defendants deny the allegations contained in the second sentence of Paragraph 6 of the Complaint.

7. Defendant JB Investment, LLC admits the allegations contained in Paragraph 7 of the Complaint.

8. Defendants deny the allegations contained in Paragraph 8 of the Complaint.

9. Defendants deny the allegations contained in Paragraph 9 of the Complaint.

10. Defendants deny the allegations contained in Paragraph 10 of the Complaint.

11. Defendants admit the allegations contained in Paragraph 11 of the Complaint with respect to JB Investment, LLC, but deny the allegations with respect to the other Defendants.

#### **JURISDICTION AND VENUE**

12. Defendants admit that this Court has jurisdiction over this matter, as alleged in Paragraph 12 of the Complaint.

13. Defendants admit that venue is proper in this court, as alleged in Paragraph 13, but deny that any of the events alleged in the Complaint are valid.

#### **FACTUAL ALLEGATIONS**

14. Defendants admit that Plaintiff worked overtime hours, but cannot otherwise admit or deny the allegations contained in Paragraph 14 of the Complaint because “numerous” is vague and ambiguous. Defendants further deny that Plaintiff was employed by any Defendant through August 4, 2018.

15. Defendants deny the allegations contained in Paragraph 15 of the Complaint.

16. Defendants admit that Plaintiff was not an exempt employee, as alleged in Paragraph 16 of the Complaint, but deny all other allegations contained in Paragraph 16.

17. Defendants deny the allegations contained in Paragraph 17 of the Complaint.

18. Defendants admit that Plaintiff reported her time to Defendant JB Investment, LLC and was paid for time reported, but deny all other allegations contained in Paragraph 18 of the Complaint.

19. Defendants deny the allegations contained in Paragraph 19 of the Complaint.

20. Defendants deny the allegations contained in Paragraph 20 of the Complaint.

21. Defendants admit that Plaintiff, while employed by JB Investment, LLC, was entitled to be paid one and one-half times her regular rate for hours worked in excess of 40 during a work week, but deny all other allegations contained in Paragraph 21 of the Complaint.

22. Defendant JB Investment, LLC denies the allegations contained in Paragraph 22 of the Complaint. Defendants Khushmeet Dhillon and Gurleen K. Dhillon admit the allegations contained in Paragraph 22 of the Complaint to the extent that neither was ever the Plaintiff's employer and therefore neither had any payment obligations to Plaintiff whatsoever.

23. Defendants deny the allegations contained in Paragraph 23 of the Complaint and deny that Plaintiff is entitled to the relief sought therein.

24. Defendants deny that Plaintiff is entitled to the relief sought in Paragraph 24 of the Complaint.

25. Defendants deny that Plaintiff is entitled to the relief sought in Paragraph 25 of the Complaint.

26. Defendants are without sufficient information to admit or deny the allegations contained in the first and second sentence of Paragraph 26 of the Complaint. The third sentence of Paragraph 26 of the Complaint contains no factual allegations requiring a response. Defendants deny the allegations contained in the fourth sentence of Paragraph 26 of the Complaint and further deny that Plaintiff is entitled to the relief sought therein.

27. Defendants deny that Plaintiff is entitled to any of the relief sought under “Prayer for Relief” in the Complaint, including all lettered subparts of that section.

**AFFIRMATIVE DEFENSES**

1. At all times Defendants acted in good faith and had reasonable grounds for believing their actions were in compliance with the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.* (“FLSA”).

2. The Plaintiff’s claims are estopped by the submission of her own time records, for which she was compensated for all time worked and claimed, including overtime hours.

Respectfully submitted,

/s/ R.S. Ghio  
R.S. Ghio  
Texas State Bar No. 00787531

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ATTORNEY FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on call counsel of record, through the Court's ECF filing system, on December 10, 2018.

/s/ R.S. Ghio